

Supplemental Statement

**Pursuant to the Foreign Agents Registration Act of
1938, as amended**

For Six Month Period Ending November 2015

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

Marston Webb & Associates

(b) Registration No.

5929

(c) Business Address(es) of Registrant

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

- | | | |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- | | | |
|--------------------------|------------------------------|----------------------------------------|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

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IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).

3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
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(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐ No ☒

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Foreign Principal

Date of Termination

The Bermuda Ministry of Finance
Bermuda Ministry of Business Development & Tourism

March 31, 2010
March 31, 2013

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☐ No ☐

Exhibit B⁴ Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, identify each foreign principal and describe in full detail your activities and services:

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS-MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☐ No ☒

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Date	From Whom	Purpose	Amount
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Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D⁸ to your registration? Yes ☐ No ☒

If yes, indicate the date the Exhibit D was filed. Date _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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^{6, 7} A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒
- (2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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Total

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?¹²
 Yes ☐ No ☒

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?
 Yes ☐ No ☐

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) _____

Electronic Communications

- ☐ Email
☐ Website URL(s): _____
☐ Social media websites URL(s): _____
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in the informational materials:

- ☐ English ☐ Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?
 Yes ☐ No ☐

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

February 16, 2016

(Print or type name under each signature or provide electronic signature¹³)Victor G. Weber
VICTOR G. WEBER

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¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

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LETTER OF AGREEMENT

BETWEEN

THE BERMUDA MINISTRY OF FINANCE
30 Parliament Street
Hamilton HM 12, Bermuda

AND

MARSTON WEBB INTERNATIONAL
60 Madison Avenue
New York, New York 10010 USA

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This agreement is made the first day of January 2009 by and between the Bermuda Ministry of Finance and/or Bermuda Stock Exchange (hereinafter referred to as MOF and BSX) and Marston Webb International (hereinafter referred to MWI).

In order to broaden and increase Bermuda's investor base and market recognition in the U.S. and abroad, MWI will provide the following services:

1. Consult with MOF and BSX management in all matters pertaining to investor related marketing and media strategy in the U.S. and in certain other countries or groupings of countries (including but not limited to the European Union, Latin and South America, Mid-East and Asia) as required.
2. Develop and implement various forms of IR, Public relations and other media outreach.
3. Assist MOF and BSX management in arranging investors' briefings and other meetings including individual or group presentations.
4. Create and distribute press releases and other forms of communication to the media, investors and advisory groups.
5. When practical, endeavor to arrange media interviews and encourage key journalists and newsletter publishers to follow Bermuda's story and in other ways, foster positive media attention and coverage on the inward investment opportunities that Bermuda and the BSX afford companies and investors in the U.S. and abroad.
6. Consult with management on inquiries and questions posed by institutional and private investors and the media.

7. Identify and maintain contact with prospective investors, fund managers, brokers, institutions and provide information regarding the inward investment opportunities which Bermuda and the BSX affords.
8. Advise management on conference, seminar participation and ensure that investors and/or media attending each event are made aware of Bermuda's presence in order to arrange meetings and/or interviews.
9. Provide direct mail facilities – including distribution of brochures, reports, newsletters, media coverage and reprints – to prospective investors, fund managers, brokers, investment advisory and money management groups and others in the U.S. and Canada.
10. Create and place advertisements for the MOF and/or BSX in various U.S. and international business and investor related publications as required.

For these services, MOF agrees to pay MWI a retainer fee of \$12,500 per month payable in advance. It is further agreed that all out-of-pocket expenses will be billed back to MOF and/or BSX at cost.

As part of the agreement, MWI undertakes to provide MOF with a quarterly report on its activities on behalf of MOF and the BSX. The first such report shall be due on or before 24 April 2009 for the quarter ending 31 March 2009.

This agreement shall be in effect until March 31, 2010, after which it may be renewed for a further period, or terminated by either party giving the other 90 days notice.

This agreement shall be governed by the laws of Bermuda.


SIGNED: 

Donald A.M. Scott

For:

BERMUDA MINISTRY OF FINANCE

DATE 15th January 2009

SIGNED: 

Victor Webb

For:

MARSTON WEBB INTERNATIONAL

DATE 15 January 2009.

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LETTER OF AGREEMENT

BETWEEN

BERMUDA MINISTRY OF BUSINESS DEVELOPMENT & TOURISM

30 Parliament Street
Hamilton HM 12, Bermuda

AND

MARSTON WEBB INTERNATIONAL

60 Madison Avenue, Ste 1212
New York, NY 10010

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This agreement is made the 1st day of January 2012 by and between the Bermuda Ministry of Business Development & Tourism and (hereinafter referred to as MOBDT) and Marston Webb International (hereinafter referred to MWI).

In order to broaden and increase Bermuda's investor base and market recognition in the U.S. and abroad, MWI will provide the following services:

1. Consult with MOBDT and Bermuda Stock Exchange (the "BSX") management in all matters pertaining to corporate and/or investor related marketing and media strategy in the U.S. and in certain other countries or groupings of countries (including but not limited to the European Union, Latin and South America, Mid-East and Asia), as required.
2. Develop and implement various forms of IR, public relations and other media outreach.
3. Assist MOBDT and the BSX management in arranging investors' briefings and other meetings including individual or group presentations.
4. Create and distribute press releases and other forms of communication to the media, investors and advisory groups.
5. When practical, endeavor to arrange media interviews and encourage key journalists and newsletter publishers to follow Bermuda's story and in other ways, foster positive media attention and coverage on the inward investment opportunities that Bermuda and the BSX afford companies and investors in the U.S. and abroad.
6. Consult with the Minister of Business Development & Tourism and MOBDT officials on inquiries and questions posed by institutional and private investors and the media.
7. Identify and maintain contact with prospective investors, fund managers, brokers, institutions and provide information regarding the inward investment opportunities which Bermuda and the BSX afford.

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8. Advise the Minister and MOBDT officials on conferences, seminar participation and ensure that investors and/or media attending each event are made aware of Bermuda's presence in order to arrange meetings and/or interviews.
9. Provide direct mail facilities – including distribution of brochures, reports, newsletters, media coverage and reprints – to prospective investors, fund managers, brokers, investment advisory and money management groups and others in the U.S. and Canada.
10. Create and place advertisements for the MOBDT and/or BSX in various U.S. and international business and investor related publications as required.

For these services, MOBDT agrees to pay MWI a retainer fee of \$15,000 per month payable in advance on the first day of each month. It is further agreed that all out-of-pocket expenses will be approved by the MOBDT and billed back to MOBDT at cost.

As part of the agreement, MWI undertakes to provide MOBDT with a quarterly report on its activities on behalf of MOBDT and the BSX. The first such report shall be due on or before 30th June 2012 for the quarter ending March 31st, 2012.

Monthly meetings will be held as between MWI and representatives from the MOBDT to ensure that the activities of MWI are performed in a manner consistent with the core objectives of the MOBDT which will include but shall not be limited to job creation, GDP growth, industry diversification, brand reinvigoration and industry sustainability.

This agreement shall be in effect until 31st March 2013, after which it may be renewed for a further period or terminated by either party giving the other 90 days notice.

This agreement shall be governed by the laws of Bermuda.

SIGNED: [Signature]
Print Name: TRAVIS L. GELBERG

SIGNED: [Signature]
Print Name: VICTOR G. LIEBS

BERMUDA MINISTRY OF BUSINESS
DEVELOPMENT & TOURISM

MARSTON WEBB INTERNATIONAL

DATE 1/25/12

DATE 1/25/12